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*AMAZON.COM, INC.*

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MASTEROBJECTS, INC.,

Plaintiff,

v.

AMAZON.COM, INC.,

Defendant.

Case No. 3:20-cv-08103-WHA

**JOINT STIPULATED REQUEST AND  
[PROPOSED] ORDER**

Complaint Filed: May 5, 2020

Trial Date: October 11, 2022

1 Plaintiff MasterObjects, Inc. (“MasterObjects”) and Defendant Amazon.com, Inc.  
 2 (“Amazon”), pursuant to Civil Local Rule and 7-12, jointly submit this stipulated request for an order  
 3 of referral to the Special Master:

4 WHEREAS the last day to file discovery motions based on expert discovery violations was  
 5 on July 7, 2022, and the close of expert discovery was on July 14, 2022;

6 WHEREAS MasterObjects produced a one page email with several redactions from its  
 7 counsel (Hosie Rice LLP) to its damages expert (Dr. William Latham) on July 18, 2022;

8 WHEREAS Amazon has questioned the scope of the redactions;

9 WHEREAS the parties asked if Special Master McElhinny were willing to review this one  
 10 page email *in camera* and assess whether the redactions were proper. Special Master  
 11 McElhinny agreed to assist with this dispute;  
 12

13 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, and  
 14 subject to approval by the Court that: the dispute over MasterObjects’ redactions to counsel’s one  
 15 page May 21, 2022, email to Dr. Latham shall be referred to Special Master McElhinny for  
 16 resolution.  
 17

18 Dated: August 16, 2022

19 /s/ Diane S. Rice

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8  
9 *Attorneys for Defendant AMAZON.COM, INC.*

**ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Date: August 16, 2022

/s/ Thomas B. King  
Thomas B. King

**~~PROPOSED~~ ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: August 16, 2022



Honorable William Alsup  
United States District Judge